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VIA ECF

Honorable Paul G. Gardephe
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Thorogood v. New York Times Company, et al.*
Case No.: 22-cv-02042

Dear Judge Gardephe:

We represent the Defendants in the above referenced matter. We write, jointly with counsel for Plaintiff, to respectfully request a stay of the current deadlines in this matter while the parties explore settlement. For the past several weeks, counsel for the parties have engaged in fruitful settlement discussions. However, counsel has come to the point where they believe a private mediator could assist in bridging the gap between the parties to reach a settlement. The parties have agreed to private mediator Elizabeth Shampnoi, and the mediation is scheduled for March 7, 2023, the first date that was available for all parties, counsel and the mediator.

Considering the above, counsel jointly requests a stay of all deadlines in this matter through April 7, 2023 (30 days after the mediation).

We appreciate your courtesy and consideration of this request.

Respectfully Submitted,

LITTLER MENDELSON, P.C.

/s/ *Kimberly N. Dobson*
Kimberly N. Dobson

KND

cc: All counsel of record (*via ECF*)

MEMO ENDORSED

The Application is granted.

SO ORDERED:

A handwritten signature in black ink that appears to read "Paul G. Gardephe".

Paul G. Gardephe, U.S.D.J.

Dated: January 20, 2023